

United States District Court
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DISTRICT OF**ALABAMA**

UNITED STATES OF AMERICA
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

CRIMINAL COMPLAINTCASE NUMBER: *2:05MJ89-B***SANDRA G. DIXON**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 4, 2005 in Montgomery county, in the Middle District of Alabama defendant(s) did, (Track Statutory Language of Offense)

knowingly attempt to execute a scheme and artifice to obtain any of the moneys, funds, credits, assets, securities and other property owned by, or under the custody or control of a financial institution by means of false and fraudulent pretenses, representations, and promises,

in violation of Title 18 United States Code, Section(s) 1344(2).

I further state that I am a(n) United States Secret Service Agent and that this complaint is based on the following facts:

Official Title

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No

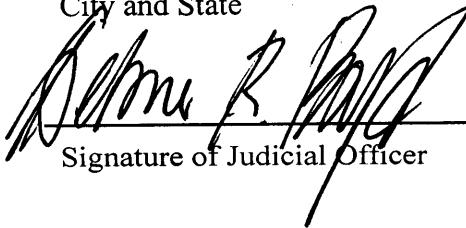


Signature of Complainant

Sworn to before me and subscribed in my presence,

August 5, 2005at Montgomery, Alabama

City and State



Signature of Judicial Officer

Delores R. Boyd, U.S. Magistrate Judge

Name and Title of Judicial Officer

AFFIDAVIT

- 1) I am a Special Agent with the United States Secret Service and have been so employed since January, 1997. In March, 2005, I was assigned as the Resident Agent to Montgomery, Alabama. Prior to this appointment, I was assigned to the Presidential Protection Division in Washington D.C. and Austin, Texas. Between 1997 and 2001, I was assigned to the Houston Area Fraud Task Force where I was assigned to exclusively investigate matters of fraud. Prior to my appointment to the United States Secret Service, I was employed as a Police Officer with the Waco Police Department in Waco, Texas.
- 2) As a Special Agent of the United States Secret Service, I am currently responsible for the investigation of Federal offenses involving Bank Fraud in violation of Title 18, United States Code, Section 1344. I have received training in how to conduct investigations of offenses relating to Bank Fraud. The specialized training I have received includes various courses on the recovery of evidence and the detection of counterfeit obligations, to include counterfeit commercial checks.
- 3) This affidavit is being made in support of an application for a warrant for the arrest of Sandra G. Dixon of 3741 Wesley Drive, Montgomery, Alabama 36111.
- 4) The factual information contained in this application and affidavit is based upon my investigation and upon information provided to me by a reliable confidential informant (CI).
- 5) I have probable cause to believe that evidence of a violation of Title 18, United States Code, Section 1344, Bank Fraud, is located within 3741 Wesley Drive, Montgomery, Alabama 36111. Based upon the following information, there is probable cause to believe that Sandra G. Dixon violated Title 18, United States Code, Section 1344(2).
- 6) Title 18, United States Code, Section 1344 (2) , makes it a federal criminal offense for any person to knowingly execute, and attempt to execute a scheme or artifice to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, or under the custody or control of, a financial institution, by means of false and fraudulent pretenses, representations, or promises.

LOCAL INVESTIGATION

- 7) On July 28, 2005, the CI provided information on a subject in Montgomery, Alabama who is printing counterfeit commercial checks, counterfeit money orders and counterfeit Alabama Drivers Licenses. The CI continued that the suspect, known only as "Sandy", prints the above counterfeit items and sells them to interested persons. The CI added that the CI was inside of 3741 Wesley Drive, Montgomery, Alabama 36111, earlier that same day and witnessed the printing of a counterfeit commercial check. The CI also claimed to be present when a subject, Roscoe McCall, was arrested earlier in the day while attempting to pass the counterfeit

Regions Bank commercial check the CI had seen printed in 3741 Wesley Drive, Montgomery, Alabama 36111.

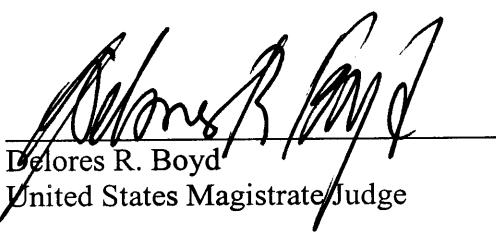
- 8) The CI agreed to return to 3741 Wesley Drive, Montgomery, Alabama 36111, and provide your affiant with examples of the counterfeit items.
- 9) Your Affiant contacted Investigator Lee of the Prattville, Alabama Police Department. Investigator Lee confirmed that they had arrested a subject passing a counterfeit check earlier in the day by the name of Roscoe McCall. He later confirmed that it was a Region's Bank commercial check with a payee of Brandon O. Johnson, identical to the checks delivered by the CI to me. He added that an unknown subject had left the scene prior to police being able to identify the subject.
- 10) On the same date, the CI returned with four (4) counterfeit Regions Bank commercial checks. The CI continued that a purchase of an unlimited amount of counterfeit commercial checks could be made for \$500, and for an additional \$500, the CI could also purchase a counterfeit Alabama drivers license in the same name as the payee name on the counterfeit checks. Further, the CI described the equipment and software "Sandy" was using to counterfeit the above items. The CI claimed to have been a witness to multiple instances when the suspect, "Sandy", printed counterfeit commercial checks.
- 11) When an internet address check of 3741 Wesley Drive, Montgomery, Alabama yielded that the apartment was occupied by Sandy Garrott Dixon, a photo of Dixon was shown to the CI who confirmed that was the "Sandy" that he/she witnessed printing counterfeit bank commercial checks on 7/28/05, and previous occasions.
- 12) A check of Alabama Power Records show Sandra E. Dixon to be the subscriber for 3741 Wesley Drive, Montgomery, Alabama with her account being opened on 2/01/05.
- 13) Also on 7/ 28/05, I contacted Chris Hudgens, Regions Bank Investigator. Upon providing him the information on the checks delivered by the CI, he confirmed that the checks were, in fact, counterfeit.
- 14) On 8/02/05, I was contacted by Chris Hudgens, Regions Bank Investigator. Hudgens stated that two counterfeit checks had been negotiated in the past several days. One check was cashed for \$544.20 on 8/01/05, and the other in the amount of \$397.40 on 7/29/05. He stated that they had been passed at the Comala Credit Union in Montgomery, Alabama. Both checks are drawn on the same account number as the checks provided by the CI. Both checks are made out to Sandra G. Dixon, the same name used by the subject who the CI claims to have witnessed print the checks delivered to me on 7/28/05.

- 15) On 8/4/05 your Affiant equipped the CI with electronic recording equipment, after doing a thorough examination of the CI's person and vehicle. The CI was provided with \$1000.00 U.S. currency and traveled to 3741 Wesley Drive, Montgomery, Alabama. The CI was monitored by electronic means and by visual means by your affiant and another law enforcement officer.
- 16) On 8/4/05 the CI entered the premises in an attempt to purchase counterfeit items to include counterfeit commercial checks, and was successful in purchasing over \$80,000 in fraudulent commercial checks as well as 2 Alabama Driver's Licenses, and 1 Alabama Identification card. The identification documents purchased by the CI are consistent with the payees listed on the fraudulent commercial checks, and were not issued to Sandra Dixon. All of the above-mentioned was purchased from Sandra Dixon.
- 17) Upon the CI exiting the residence and presenting your Affiant with the fraudulent documents and identification documents, the anticipatory search warrant approved by United States Magistrate Judge Delores R. Boyd on 8/3/05, was executed. Once inside the residence, your Affiant located additional instruments and fruits of illegal activity to include: counterfeit commercial checks; counterfeit US currency; numerous identification documents; and a computer which was in operation, creating additional fraudulent commercial checks. Also located was the person of Sandra G. Dixon.
- 18) WHEREFORE, your affiant respectfully requests that an arrest warrant be issued against Sandra G. Dixon for violations of Title 18, United States Code, Section 1344(2), Bank Fraud.



Leighton Greenlee
Special Agent Leighton Greenlee
United States Secret Service
Affiant

Subscribed and sworn before me
on this 5th day of August, 2005.



Delores R. Boyd
United States Magistrate Judge